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9 **ATTORNEYS FOR PLAINTIFF**

10 **IN THE UNITED STATES DISTRICT COURT**

11 **FOR THE DISTRICT OF ARIZONA**

12 IN RE: BARD IVC FILTERS PRODUCTS) Case No.: 2:15-MD-02641-DGC
13 LIABILITY LITIGATION)
14 This document relates to:) Assigned to the Honorable David G. Campbell
15 **Pamela M. Smith v. C.R. Bard, Inc., et al.;**) **STIPULATION OF DISMISSAL WITHOUT**
16 **Case No. 2:17-cv-03089-DGC**) **PREJUDICE**
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19 **TO THE HONORABLE JUDGE OF SAID COURT:**

20 COME NOW, Plaintiff Pamela M. Smith and Defendants C.R. Bard Inc. and Bard Peripheral
21 Vascular Inc., and file this Stipulation of Dismissal without Prejudice, and in support thereof,
22 respectfully show the Court as follows:

23 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff and Defendants C.R. Bard
24 Inc. and Bard Peripheral Vascular Inc. have stipulated to the dismissal of this action without prejudice
25 to the re-filing of same. Plaintiff and Defendants C.R. Bard Inc. and Bard Peripheral Vascular Inc.
26 further stipulate that they are to bear their own costs.

1 WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendants C.R. Bard Inc. and Bard
2 Peripheral Vascular Inc. hereby respectfully request that the Court dismiss this action in its entirety
3 without prejudice to the re-filing of same and order that these parties are to bear their own costs.

4 Dated: March 7, 2019

Respectfully submitted,

5 **FREESE & GOSS, PLLC**

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25 **C.R. BARD INC. AND BARD**
26 **PERIPHERAL VASCULAR INC.**

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CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that on March 7, 2019, I electronically filed the foregoing with the Clerk
3 of the Court by using the CM/ECF system which will send notification of such filing to all counsel of
record.

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